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Attorneys for Defendant
JOHN MUIR HEALTH, ANGELA PERCIVAL and
SARA MONAHAN

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CAMINO BELL, an individual,)	CASE NO. 15-CV-04564 - RS
)	
Plaintiff,)	
)	STIPULATION AND [PROPOSED]
vs.)	ORDER REGARDING CONTINUANCE
)	OF FACT DISCOVERY DEADLINE TO
JOHN MUIR HEALTH, a California)	DECEMBER 5, 2016 AND EXPERT
corporation, JOHN MUIR MEDICAL)	DISCOVERY DEADLINE TO
CENTER, an unknown business entity, and)	JANUARY 13, 2017
DOES 1-20, et al)	
)	
Defendants.)	Hon. Judge Richard Seeborg
)	
)	Complaint Filed: October 2, 2015

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STIPULATION

Pursuant to the Case Management Conference held on September 1, 2016, and the Civil Local Rule 7-12, the Plaintiff Camino Bell and Defendants John Muir Health, Angela Percival, and Sara Monahan (hereafter collectively referred to as “the Parties”), through their attorneys of record, hereby jointly stipulate and request a continuance of the current fact discovery deadline of November 4, 2016 to December 5, 2016, and the current deadline to disclose expert disclosures of December 16, 2016 to January 13, 2017 based on the good cause set forth below.

Plaintiff’s Complaint was filed on October 2, 2015 in the above-entitled court. A case management conference was held on September 1, 2016. See Docket #1. The case was referred to Magistrate Judge Joseph C. Spero for settlement purposes. See Docket #27. A Settlement Conference is scheduled for November 3, 2016. See Docket #28. The discovery cut-off deadline in the case is November 4, 2016. See Docket #21. The current deadline to exchange expert disclosures in the case is December 16, 2016. See Docket #21. The trial date for this action is presently set for May 8, 2017. See Docket #21.

The parties believe that a brief continuance of the discovery deadlines will allow the parties to participate meaningfully in settlement negotiations at the upcoming settlement conference scheduled for November 3, 2016, while still allowing time for the parties to complete fact discovery and exchange expert disclosures prior to the proposed deadlines.

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Subject to the approval of this Court, the parties have agreed to continue the fact discovery deadline from November 4, 2016 to December 5, 2016 and the current deadline to exchange expert disclosures be continued from December 16, 2016 to January 13, 2017. The parties have also agreed to set a deposition schedule in good faith in the event that mediation is unsuccessful.

Dated: October 5, 2016

GORDON REES SCULLY MANSUKHANI LLP

By: /S/ Hieu Tran

MICHAEL D. BRUNO

HIEU TRAN

Attorneys for Defendants

JOHN MUIR HEALTH, ANGELA PERCIVAL, SARA MONAHAN

Dated: October 5, 2016

ROSEN SABA LLP

By: /S/ James R. Rosen

JAMES R. ROSEN

ELIZABETH L. BRADLEY

Attorneys for Plaintiff

CAMINO BELL

PROPOSED ORDER

Having considered the Parties' Joint Stipulation to Continue the Fact Discovery Deadline, as well as the Court's schedule, the Court hereby continues fact discovery deadline to December 5, 2016 and the deadline to exchange expert disclosures to January 13, 2017 as requested.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 10/5/16



RICHARD SEEBORG
United States District Judge